

EXHIBIT 3

3

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

ESTATE OF GEORGE BERNARD
WORRELL, JR.,

Case No. 4:22 cv 11009

Plaintiff,

Hon. Shalina D. Kumar

v.

Hon. Mag. David R. Grand

THANG, INC., GEORGE CLINTON,
SONY MUSIC ENTERTAINMENT,
UNIVERSAL MUSIC GROUP,
WARNER BROTHERS RECORDS,
HDH RECORDS, WESTBOUND
RECORDS AND SOUND
EXCHANGE, INC.

Defendants.

JAMES P. ALLEN, SR. (P52885)
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Attorneys for Defendants, Thang, Inc.
and George Clinton, only

**DEFENDANT CLINTON'S FIRST REQUEST TO PRODUCE
DOCUMENTS TO PLAINTIFF ESTATE OF GEORGE BERNARD
WORRELL, JR.**

INSTRUCTIONS

Defendant, George Clinton, through its attorneys, ALLEN BROTHERS, Attorneys & Counselors, P.L.L.C., by JAMES P. ALLEN, SR., and pursuant to Fed.R.Civ.P 34, demand that Plaintiff, Estate of George Bernard Worrell, fully answer each and every one of Requests for Production of Documents, separately, in writing and under oath certifying their accuracy and completeness within thirty (30) days after the service hereof. These answers are to include such information as is available to Plaintiff and/or such information as could be obtained by it from the employers, agents, representatives, accountants, private investigators, attorneys, lessees, sureties, and/or any other person, firm or corporation in possession of or who may have obtained information from or on behalf of Plaintiff or with whom said Parties have dealt with in connection with the subject matter covered by these Requests to Produce.

The answer provided must be signed under oath by the person answering the Requests to Produce. If an objection is made to a Request to Produce, the specific reasons for the objection shall be stated in lieu of an answer and must be signed by the attorney making the objection. A Request to Produce otherwise proper is not necessarily objectionable merely because the answer to a Request to Produce involves a document with an opinion or contention that relates to the application of law to fact.

If Plaintiff claims in any response that the information or documents requested are privileged and not subject to discovery, Plaintiff shall identify the privilege(s) claimed and explain in detail why the privilege(s) are alleged to apply. If the objection is to producing, or revealing in detail, the contents of a document which Plaintiff believes contains privileged information, Plaintiff must provide the following:

- a. The type of document;
- b. Its date;
- c. Its author;
- d. The recipient(s) of all originals and copies;
- e. A general description of its contents; and
- f. The precise nature of the privilege claimed.

Please take notice that these Requests for Production of Documents are deemed continuing so as to require supplemental answers if you or anyone acting on your behalf should obtain further information after submission of answers hereto which would tend to change or modify, wholly or in part, any such answer, with said supplemental answers to be filed and served at the offices of Allen Brothers, Attorneys & Counselors, P.L.L.C., 401 N. Main St. Royal Oak, MI 48067 within thirty (30) days after receipt of such information, or prior to trial, whichever comes first.

After answering these requests to produce, if information not disclosed in the answers later comes to their attention, Plaintiff is required to promptly supplement its answers relative to:

- a. The identity, location of production of the document;
- b. The identity of each person Plaintiff expects to call as an expert witness at trial, the subject matter on which the expert is expected to testify, and the substance of the expert's testimony; or if
- c. An answer was incorrect when made; or
- d. An answer, though correct when made, is no longer true, accurate or complete.

DEFINITIONS

The following definitions and instructions are applicable to each request for production unless indicated otherwise by the context:

“Communication” includes but is not limited to any and all of the following: documents, oral conversation, conversations by telephone, text message, electronic mail, social media, meetings and any other exchange of information in any form.

“Complaint” means the complaint served by Plaintiff in the above captioned action.

“Document” or **“documents”** include writings of any kind, charts, photographs, phone records, tapes and tape recordings, notes, electronic mail, text message, social media posts, computer files, diaries or diary entries, calendars or calendar entries, memos or memorandum, personal records, evaluations and any other data compilation or thing from which information can be obtained or translated.

“Identify” in connection with a **“person”** means:

State the name, title and present business and/or residential addresses, and business and residential telephone numbers.

“Identify” in connection with an **entity other than a “person”** means:

State the nature of the entity (e.g. place of business, etc.), the address of its office or other location, and identify the person or persons acting on behalf of such entity in the matters inquired about.

“Identify” in connection with a **“document”** means:

State the nature of the document, the date it was written or published, the source of the document, the author of the document, the substance of the document and the page, pages, sections, chapters, provisions or subprovisions upon which Defendant relies to support any claim, answer or assertion.

“You” or **“your”** means Plaintiff and each person who has acted or purported to act on its behalf or on behalf of Plaintiff’s decedent.

“George Bernard Worrell, Jr.” shall mean the artist performing as Bernie Worrell, his estate and those in privity with him.

REQUESTS TO PRODUCE

REQUEST TO PRODUCE # 1:

Please produce any expert witness reports prepared for the above captioned case or for Estate of George Bernard Worrell, Jr. v. Thang, Inc. and George Clinton, New York Supreme Court, Case No. 652872/2019.

ANSWER:

REQUEST TO PRODUCE # 2:

Please produce any documents, data, and/or information provided to your experts in connection with the above case or Estate of George Bernard Worrell, Jr. v. Thang, Inc. and George Clinton, New York Supreme Court 652872/2019.

ANSWER:

REQUEST TO PRODUCE # 3:

Please produce any income tax returns together with schedules and proof of income (1099's, W-2's etc) for:

- (a) Estate of George Bernard Worrell, Jr. 2016-pres.
- (b) George Bernard Worrell, Jr. 1996-2016
- (c) Judy Worrell 1996-pres
- (d) Any corporate entity owned/controlled by George Bernard Worrell or those in privity with him that received royalties of any sort or nature for any copyrighted work.

ANSWER:

REQUEST TO PRODUCE # 4:

Please produce any royalty statements or other proof of payment of royalties paid to George Bernard Worrell, Jr. for any copyrighted work that is the subject of your Complaint.

ANSWER:

REQUEST TO PRODUCE # 5:

Please produce any document that You claim establishes your interest in any copyrighted work for which you seek damages in Your Complaint.

ANSWER:

REQUEST TO PRODUCE # 6:

Please produce any Communication between You and any other Party named as a defendant in Your Complaint.

ANSWER:

REQUEST TO PRODUCE # 7:

Please produce any communications between Armen Boladian or anyone/any entity acting on his behalf and:

- (a) Judy Worrell
- (b) George Bernard Worrell
- (c) Any attorney at Dickenson Wright law firm concerning George Clinton and/or the allegations in the Complaint.

ANSWER:

REQUEST TO PRODUCE # 8:

Please produce any document that you intend to rely upon to establish any allegation in Your Complaint.

ANSWER:

REQUEST TO PRODUCE # 9:

Please produce a copy of any witness statement, whether written, on video or in other media, electronic or otherwise, relating to or supporting in any way any allegation set forth in the Complaint.

ANSWER:

REQUEST TO PRODUCE # 10:

Please produce any document that contains any evidence that You took any step to perfect any copyright interest in any work that is the subject of the Complaint.

ANSWER:

REQUEST TO PRODUCE # 11:

Please produce any agreement between You and Armen Boladian or any entity in which he has or had an ownership interest.

ANSWER:

REQUEST TO PRODUCE # 12:

Please produce any document on which George Bernard Worrell relied in verifying on December 4, 1981 the complaint he filed in the New York Supreme Court entitled George Bernard Worrell v. Thang, Inc, Malbiz Music, Inc., and George Clinton, Index No 06238/82.

ANSWER:

REQUEST TO PRODUCE # 13:

Please produce any communication between You and any witness in this case concerning any allegation in the Complaint or defense asserted by any defendant in this case.

ANSWER:

REQUEST TO PRODUCE #14:

Please produce any communication pertaining to the case at bar between Plaintiff's counsel and counsel for any of Defendants identified in ECF 35 PageID 248 as Warner Records, Sony Music Entertainment, Universal Music Group, and SoundExchange, Inc.

ANSWER:

Dated: October 11, 2022

ALLEN BROTHERS, PLLC

/s/James P. Allen, Sr.
James P. Allen, Sr. (P52885)
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CERTIFICATE OF SERVICE

I hereby certify that on **October 11, 2022**, I served via First Class US Mail with postage fully prepaid Defendants George Clinton and Thang, Inc.'s First Request to Produce and this Certificate of Service upon:

Daniel D. Quick, Esq.
2600 W. Big Beaver Road, Ste. 300
Troy, MI 48084

/s/Veronica Durr
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Royal Oak, MI 48067
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vdurr@allenbrotherspllc.com